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**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

ROBERT HUNTER BIDEN,
an individual,
Plaintiff

v.

PATRICK M. BYRNE,
an individual,
Defendant

Case No. 2:23-cv-09430

***DECLARATION OF PATRICK
M. BYRNE IN SUPPORT OF
MOTION FOR STAY***

Pursuant to 28 U.S. Code § 1746, Patrick M. Byrne, (hereinafter referred to as the “DECLARANT”), states as follows:

1. I am the Defendant in the above-captioned defamation case currently pending in the United States District Court for the Central District of California.

1 2. I submit this affidavit in support of the Motion to Stay
2 proceedings pending resolution of the Petition for Writ of Mandamus
3 regarding the denial of Stefanie Lamberts pro hac vice admission.
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5 3. I have retained Stefanie Lambert as my counsel of choice due
6 to her extensive experience and expertise in political abuses, particularly
7 how irregular or improper actions influence or determine government
8 results at odds with the will of the American people.
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10 4. Attorney Lambert has served as a prosecutor for over a
11 decade in Wayne County, Michigan, and to my knowledge has performed
12 very successfully with little or no controversy or complaint.
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14 5. Attorney Lambert has since specialized in criminal defense
15 and political lawfare that is being used to suppress the truth that the public
16 needs to know about the functioning of their government.
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18 6. To my knowledge it is only when Attorney Lambert has
19 assisted me or my colleagues in lawsuits that for some reason are
20 controversial (they should not be, but should be common sense) about
21 improving our elections and the functioning of our country that certain
22 interest groups have attacked her with lawfare.
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24 7. Because there have been so many such cases, Attorney
25 Lambert has learned a great deal about me, my efforts and plans, my
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1 preferences for approaching litigation, and the like. She has already
2 engaged in a steep learning curve including about the tactics of those who
3 are for some odd reason my opponents.
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5 8. Attorney Lambert has represented me in other legal matters,
6 and I have full confidence in her ability to provide effective and efficient
7 representation in this case.
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9 9. The District Court denied Attorney Lambert's for *pro hac*
10 *vice* admission to represent me in this matter.
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12 10. The denial of Attorney Lambert's *pro hac vice* admission has
13 significant implications for my constitutional right to counsel of choice,
14 as her expertise is critical to my defense in this highly complex and detail-
15 intensive case.
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17 11. Indeed, the Court denied both of the attorneys I asked to help
18 me, on the same day, amplifying the extent of the loss of my ability to
19 proceed with litigation as we decide is best.
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21 12. I respectfully request that the Court stay all proceedings in
22 this matter until the resolution of the Appeal and Petition for Writ of
23 Mandamus to ensure that I am afforded the opportunity to be represented
24 by my counsel of choice.
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1 13. I believe that proceeding without Attorney Lambert's
2 representation would result in inefficiencies and potential prejudice to my
3 defense, given her unique qualifications and familiarity with the subject
4 matter of this case, specifically the technical aspects of the events at issue,
5 where evidence of the Biden families' co-mingling of personal business
6 and governance came from, how to analyze it and substantiate it, without
7 getting distracted by deflection.
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10 14. I have not been able to find other lawyers that understand the
11 subject matter needed to successfully litigate this case on my behalf,
12 including her lack of being intimidated and understanding of the process
13 in these kinds of cases.
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15 15. Peter Ticktin is a talented trial lawyer, but Ms. Lambert is
16 needed to try this case due to her specialized knowledge.
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18 16. Attorney Peter Ticktin, is knowledgeable as to the Biden
19 family's business dealings necessary to conduct a thorough examination
20 of witnesses, including Mr. Biden, and I would like Mr. Ticktin, and Ms.
21 Lambert to work as a team to represent me.
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1 I declare under penalty of perjury that the foregoing is true and
2 correct.

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4 Executed on October 13, 2025

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6 *Patrick M. Byrne*

7 PATRICK M. BYRNE
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